

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
GLOBAL CLEAN ENERGY)	Case No. 25-90113 (ARP)
HOLDINGS, INC., <i>et al.</i> , ¹)	
)	
Debtors.)	(Jointly Administered)
)	

**FIRST SUPPLEMENTAL DECLARATION OF
ERIC W. KAUP IN SUPPORT OF DEBTORS' APPLICATION FOR
ENTRY OF AN ORDER (I) AUTHORIZING THE RETENTION
AND EMPLOYMENT OF HILCO VALUATION SERVICES, LLC
EFFECTIVE AS OF THE PETITION DATE, (II) WAIVING CERTAIN
TIMEKEEPING REQUIREMENTS, AND (III) GRANTING RELATED RELIEF**

I, Eric W. Kaup, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information and belief:

1. I am an Executive Vice President, Chief Commercial Officer, and Special Counsel of Hilco Trading, LLC, the parent of Hilco Valuation Services, LLC ("Hilco"), which maintains an office at 5 Revere Drive, Suite 206, Northbrook, Illinois 60062.

2. On April 29, 2025, I submitted that certain *Declaration of Eric W. Kaup In Support of the Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Hilco Valuation Services, LLC Effective as of the Petition Date, (II) Waiving Certain Timekeeping Requirements, and (III) Granting Related Relief* (the "Original Declaration") in support of the *Debtors' Application for Entry of an Order (I) Authorizing the Retention and*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/GCEHoldings>. The location of Debtor Global Clean Energy Holdings, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is: 6451 Rosedale Highway, Bakersfield, California 93308.

Employment of Hilco Valuation Services, LLC Effective as of the Petition Date, (II) Waiving Certain Timekeeping Requirements, and (III) Granting Related Relief [Docket No. 95] (the “Application”).

3. I am duly authorized to make and submit this supplemental declaration (this “Supplemental Declaration”) on behalf of Hilco in further support of the Application.

4. Except as otherwise stated in this Supplemental Declaration, I have personal knowledge of or have relied upon the knowledge of others employed by Hilco with respect to the matters set forth herein.² If called as a witness, I would testify to the facts set forth in this Supplemental Declaration.

5. As set forth in the Original Declaration, Hilco undertook a conflicts analysis process to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtors’ estates.

6. Since the filing of the Application and Original Declaration, Hilco has searched additional parties identified by the Debtors and its representatives as potential parties in interest in these chapter 11 cases listed on **Schedule 1** hereto (the “Additional Parties in Interest”). To the extent that this inquiry has revealed any connections to certain Additional Parties in Interest, those connections are listed on and described in the attached **Schedule 2**.

7. For the reasons set forth in the Original Declaration and this Supplemental Declaration, Hilco believes that it (a) is a disinterested person as defined in the Bankruptcy Code and (b) does not hold or represent any interest adverse to the Debtors’ estates.

8. If any new relevant facts or relationships are discovered or arise during the

² Certain information set forth herein relates to matters (i) contained in Hilco’s books and records and (ii) within the knowledge of other Hilco employees, and is based on information provided by such employees.

pendency of these chapter 11 cases, Hilco will use reasonable efforts to identify such further developments and will promptly file a supplemental affidavit as required by Bankruptcy Rule 2014.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, to the best of my knowledge, information, and belief, and after reasonable inquiry, the foregoing is true and correct.

Dated: July 21, 2025

/s/ Eric W. Kaup

Eric W. Kaup
Executive Vice President, Chief Commercial
Officer, and Special Counsel
Hilco Trading, LLC

Schedule 1

Additional Parties in Interest

CONTRACT COUNTER PARTIES

DELEK US HOLDINGS INC
ALON PARAMOUNT HOLDINGS INC.

ORDINARY COURSE PROFESSIONALS

ALLENDE & BREA ABOGADOS
BELDEN BLAINE RAYTIS, LLP
BELDEN BLAINE EMPLOYER LEGAL SOLUTIONS
CALIFORNIA STRATEGIES & ADVOCACY LLC
CLAREMONT TAX ASSOCIATES INC
CLIFTON LARSON ALLEN (CLA) LLP
DEMAREST
EMS ADVISORY SERVICES, LLC
GAILLE PLLC
GRANT THORNTON ADVISORS LLC
H ADVISORS ABERNATHY
INVARIANT
IZABELLE B. REYES, ESQ.
JDC CONSULTING INC.
KARMEN CONSULTING, LLC
MANATT, PHELPS & PHILLIPS, LLP
MCGRATH NORTH
MORGAN, LEWIS & BOCKIUS LLP
OSLER, HOSKIN, & HARCOURT LLP
PARACORP SOLUTIONS
POTTER ANDERSON & CORROON LLP
QUINN EMANUEL URQUHART & SULLIVAN, LLP
SALIWANCHIK, LLOYD AND EISENSCHENK
SAXE DOERNBERGER & VITA, P.C
SEYFARTH SHAW LLP
SVA CONSULTING
THOMPSON HINE LLP
TROYGOULD
VAN NESS FELDMAN LLP
WARD & BERRY PLLC
WEAVER AND TIDWELL LLP
YANKEE COMMUNICATIONS INC

TAXING AUTHORITY/GOVERNMENTAL/REGULATORY AGENCIES

ENVIRONMENTAL PROTECTION AGENCY
PROPANE EDUCATION & RESEARCH COUNCIL
SECURITIES AND EXCHANGE COMMISSION
US DEPARTMENT OF AGRICULTURE - APHIS

TOP 30 CREDITORS

AGI SURETRACK LLC
ALLIANCE TECHNICAL GROUP, LLC
ANCON MARINE DBA ANCON, ANCON SERVICES
BECHT INDUSTRIAL GROUP LLC
BRAGG COMPANIES
BRAND SCAFFOLD SERVICES, INC.
CASTLETON COMMODITIES MERCHANT TRADING L.P.
CTCI AMERICAS INC
CURTIS ELECTRICAL CONSTRUCTION INC
EARTHOPTICS INC
EMERSON LLLP
ENTARA LLC
EVOQUA WATER TECHNOLOGIES LLC
GEOSYSTEMS INTERNATIONAL, INC.
HONEYWELL INTERNATIONAL INC
INTELINAIR INC
JT THORPE & SON, INC.
LINDE, INC
MOLECULE SOFTWARE, INC
PG & E
SAVAGE SERVICES CORPORATION
SCHNEIDER ELECTRIC SYSTEMS USA, INC.
SIEMENS ENERGY, INC,
STREAMLINE INNOVATIONS INC
TARGETED GROWTH, INC.
TOPSOE INC.
TRINITY SAFETY COMPANY LLC
UNITED RENTALS NORTH AMERICA
WEST COAST ENVIRONMENTAL SOLUTIONS INC
ZALCO LABORATORIES, INC.

UCC MEMBERS

BRAGG COMPANIES
CASTLETON COMMODITIES MERCHANT TRADING L.P.
J.T. THORPE & SON, INC.
MOLECULE
TRINITY SAFETY COMPANY

UCC PROFESIONALS

PROVINCE
MCDERMOTT WILL & EMERY

VENDORS

SMALL BUSINESS ADMINISTRATION

Schedule 2

Disclosures

- a. In matters unrelated to the Debtors, Hilco and/or its affiliates have or are currently performing consulting, advisory, valuation, due diligence, IPv4 brokerage, liquidation or disposition services for, (or related to loans made by) or to, the following entities: (i) Grant Thornton Advisors, LLC, (ii) Honeywell International Inc., (iii) Linde, Inc., (iv) Siemens Energy, Inc., (v) Streamline Innovations Inc., and (vi) Thompson Hine LLP. Hilco does not believe that these connections create a conflict of interest regarding the Debtors or these Chapter 11 cases.
- b. From time to time, Hilco and/or its affiliates have collaborated with or engaged the professional services of: (i) Manatt, Phelps & Phillips, LLP, (ii) McDermott Will & Emery, (iii) Morgan, Lewis & Bockius LLP, (iv) Osler, Hoskin & Harcourt LLP, (v) Potter Anderson & Corroon LLP, (vi) Quinn Emanuel Urquhart & Sullivan, LLP, and (vii) Seyfarth Shaw LLP, in matters unrelated to the Debtors.
- c. Because of the magnitude of the entire creditor list in these cases, it is possible that Hilco may represent or may have represented other creditors of the Debtors but does not represent any such creditors in connection with these cases. Hilco presently or in the past has served as a professional person in other matters, wholly unrelated to the Debtors or these cases, in which other attorneys, accountants, and other professionals of the Debtors, creditors, or other parties in interest may have also served or serve as professional persons.